identification of the device, and an interface that is responsive to a command to configure a device for retrieving a template and substituting the network address in a record retrieved from a database for the variable in the template. In rejecting the claim, the Office Action states that the policies disclosed in the *Sciacca* patent correspond to the templates. With respect to the claimed interface, the Office Action refers to the *Sciacca* patent at column 6, lines 34-61, and column 9, lines 4-52, with the statement. "*Sciacca's* managed devices are configured by retrieving policies in associated managed device information from a database."

It is respectfully submitted that the Office Action does not identify a teaching in the *Sciacca* patent which anticipates the subject matter of claim 1. First, a person of ordinary skill in the art would not consider the policies disclosed in the *Sciacca* patent to be the same as the claimed templates. In the context of the present application, the term "template" is being used in accordance with its ordinary and commonly understood meaning, e.g. "a predesigned document that contains formatting and, in many cases, generic text."[1] In contrast, the *Sciacca* patent discloses that the policies database 320 stores "rules that dictate how to build a configuration for the particular type of managed device..." (Col. 10, lines 47-49). These rules are supplied to a device configuration generator 320 that actually carries out the configuration operation. The stored rules of the policies do not constitute the predefined configuration document itself. Rather, they instruct the device configuration generator 330 how to *build* the configuration plan.

Second, even if one were to analogize the policies disclosed in the *Sciacca* patent to templates, the patent does not disclose an interface that operates in the

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[1] Microsoft Computer Dictionary, 5th Edition, 2002, page 515.

manner recited in claim 1. Specifically, there is no disclosure that, in the configuration of a device, network addresses in a record retrieved from a database are *substituted* for variables in the template, to produce the commands that are issued to the device. While the patent discloses that the device configuration generator 330 receives inputs from both the device configuration database 310 and the policies database 320, it does not disclose that this generator functions to substitute network addresses retrieved from the configuration database for variables in the policies. Rather, the policies comprise rules that instruct the configuration generator *how* to build a configuration for a particular type of manage device. In other words, the device configuration generator actually builds the set of commands that are used to configure the device, rather than merely substituting addresses received from the configuration database for variables in the policies.

It is to be noted that the rejection does not address this particular element of the claims. The mere fact that the *Sciacca* patent discloses that the configuration of devices is performed by obtaining information from two sources, namely the configuration database and the policies database, does not inherently teach that such configuration is accomplished in the same way as recited in the claims. There is no teaching of substituting network addresses for variables in a template.

For at least these reasons, therefore, it is respectfully submitted that claim 1 and its dependent claims are not anticipated by the *Sciacca* patent. These same distinguishing features are also recited in method claim 8. Consequently, claim 8, and its dependent claims, are likewise not anticipated.

Claim 5 recites that the interface issues commands in a format generic to a plurality of different types of devices, and that the system further includes a library

containing converters for converting the generic commands into device-specific commands. The rejection of claim 5 acknowledges that the *Sciacca* patent does not disclose an interface that operates in this manner. In fact, as described in the passage beginning at column 8, line 61 (cited in the rejection), the *Sciacca* patent discloses that the device configuration generator 330 builds a device-specific configuration.

In rejecting the claim, the Office Action asserts that "configuration novices" may enter commands, and that these commands coupled with the policies comprise a generic command. Applicant is unable to identify any teaching in the reference that supports this assertion. Furthermore, the fact that a configuration novice, i.e. a user, might generate a generic command is not pertinent to the subject matter of the claim. Claim 5 recites that the *interface,* i.e. the component of the system that issues configuration commands, as a result of substituting network addresses for variables in the template, issues these commands in a generic format. The *Sciacca* patent discloses that its device configuration generator 33 generates device-specific configurations. The Office Action does not identify any disclosure of an *interface* that issues generic commands.

The Office Action asserts that the device configuration generator is analogous to the library recited in claim 5. If the device configuration generator is interpreted to be the claimed library, it is unclear what structure in the Sciacca patent corresponds to the claimed interface. It is respectfully submitted that the Office Action does not establish a *prima facie* case of obviousness that would support the rejection of claims 5, 6, 12 and 13.

For at least the foregoing reasons, it is respectfully submitted that the *Sciacca* patent does not anticipate, nor otherwise suggest, the subject matter of the pending claims, whether considered by i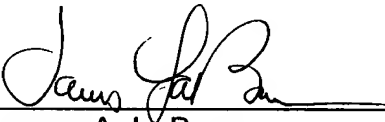tself or in combination with the *McNeely* patent. Reconsideration and withdrawal of the rejections is respectfully requested.

Respectfully submitted,

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